

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
ABERDEEN DIVISION**

**LUCILLE KEY**

**PLAINTIFF**

**V.**

**CIVIL ACTION NO. 1:23-CV-1-MPM-DAS**

**INTERNATION PAPER COMPANY, et al.**

**DEFENDANTS**

**ORDER REGARDING DISCOVERY DISPUTE**

This matter came before the court following an informal conference regarding a discovery dispute. After considering the matter, the court finds that the defendants are entitled to supplementation of the plaintiff's initial disclosures regarding the computation of different elements of her claimed damages and a detailed computation of her damages. The defendants have also propounded interrogatories and requests for production of documents addressing elements of her damages claims. The court finds that the plaintiff should supplement her responses to Interrogatories numbers 14, 16, and 17 propounded by International Paper and provide relevant documents requested in Requests numbers 1, 2, 4, 14, 15, and 18. Specifically, these responses should include a description of her out of pocket expenses and any details surrounding the reduction in her overall net worth and financial stability, including – but not limited to – her current credit score, how much her credit score has dropped, the value lost in her retirement plan, where she obtained credit cards and the monthly statements that were not timely paid and related late fees for each card. Also, any information related to any loans from family or otherwise and any additional documentation related to the computation that will be provided.

To the extent that any claims of privilege are asserted, the plaintiff shall prepare and serve a privilege log in accordance with the local rules. The computation of damages, supporting

documents, the supplemental response to the interrogatories and requests for production of documents shall be produced within fourteen days of this order.

**SO ORDERED** this the 18th day of October, 2023.

/s/ David A. Sanders  
U.S. MAGISTRATE JUDGE